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16 LOS ANGELES WATERKEEPER

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 LOS ANGELES WATERKEEPER,

20 Plaintiff,

21 vs.

22 ACCURATE STEEL TREATING, INC.,

23 Defendant.

Case No. 2:24-cv-07503-MWC-SSC

**DECLARATION OF WILLIAM
CARLON**

*[Filed concurrently with Stipulated Request
for Order Extending Deadlines]*

1 I, William Carlon, declare:

2 1. I have personal knowledge of the facts set forth below, and if called as a witness,
3 could and would testify to those facts under oath.

4 2. I am one of the attorneys representing Plaintiff Los Angeles Waterkeeper in the
5 above-captioned matter.

6 3. On September 3, 2024, Plaintiff filed the complaint initiating this action (ECF No.
7 1).

8 4. On October 15, 2024, Defendant filed its answer (ECF No. 11).

9 5. On November 8, 2024, the Parties filed their Rule 26(f) Report (ECF No. 18), and
10 on December 5, 2024, the Court issued its scheduling order (ECF No. 24).

11 6. The Parties have been engaged in good faith settlement negotiations and have
12 exchanged several drafts of a consent decree.

13 7. The Parties have made significant progress in reaching a settlement, and are
14 currently waiting on a technical consultant to provide the details of proposed Best Management
15 Practices.

16 8. The Parties wish to continue the settlement discussions without expending
17 significant resources on conducting fact and expert discovery, and therefore the Parties agree to
18 seek a 90-day extension to all deadlines currently set by Court order.

19 I swear under penalty of perjury under the laws of both California and the United States
20 that the foregoing is true and correct and that this declaration was executed on July 1, 2025 at
21 Napa, California.

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24 William N. Carlon
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